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Attorneys for Defendants
COUNTY OF ALAMEDA,
GREGORY J. AHERN in his capacity as Sheriff for County of Alameda, and Deputies MATTHEW AHLF, ALEJANDRO VALVERDE, JOSHUA SWETNAM, ROBERTO MARTINEZ, ZACHARY LITVINCHUK, RYAN MADIGAN, MICHAEL BARENO, FERNANDO ROJAS-CASTANEDA, SHAWN SOBRERO, and SOLOMON UNUBUN, all individually and in their official capacities as Deputy Sheriffs for County of Alameda

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

M.H., a minor, individually through his Guardian Ad Litem, Michelle Henshaw, JOSEPH HARRISON, KRYSTLE HARRISON, MARTIN HARRISON JR., and TIFFANY HARRISON, all Individually and as Co-Successors in Interest for Decedent MARTIN HARRISON.

Plaintiffs.

V.

COUNTY OF ALAMEDA, a municipal corporation; GREGORY J. AHERN, in his capacity as Sheriff for the COUNTY OF ALAMEDA; DEPUTIES MATTHEW AHLF, ALEJANDRO VALVERDE, JOSHUA SWETNAM, ROBERTO MARTINEZ, ZACHARY LITVINCHUK, RYAN MADIGAN, MICHAEL BARENO, FERNANDO ROJAS-CASTANEDA, SHAWN SOBRERO, SOLOMON UNUBUN, and DOES 1-20, individually, jointly and severally,

Defendants.

Case No.: 4:11-cv-02868-JST

**DECLARATION OF DEPUTY
MATTHEW AHLF IN SUPPORT OF
COUNTY DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT, OR, IN THE
ALTERNATIVE, FOR SUMMARY
ADJUDICATION OF CLAIMS**

DATE: January 23, 2014
TIME: 2:00 p.m.
PLACE: 450 Golden Gate (Courtroom 9)
JUDGE: Honorable Jon S. Tigar

Action Filed: June 10, 2011

1 I, Deputy Matthew Ahlf, declare as follows:

2 1. I am currently employed by the Alameda County Sheriff's Office ("Sheriff's Office").
3 I took my deputy sheriff's oath in January, 2006. I was assigned to Santa Rita Jail where I worked in
4 a variety of departments, including booking and classification. I became a jail training officer in
5 2007. In that capacity, I taught various courses, including those dealing with the commissary,
6 distribution of mail, handling disruptive inmates, cell extraction, and application of restraints. I was
7 transferred to Rene C. Davidson Courthouse to work as a bailiff in spring of 2009. I returned to
8 Santa Rita in April, 2010. In January, 2011, I was transferred to the Coroner's Bureau where I am
9 currently stationed. By virtue of my employment, I have personal knowledge of and am competent
10 to testify to the matters set forth in this declaration, and if called upon to do so, I would and could so
11 testify. I submit this declaration in support of County Defendants' Motion for Summary Judgment.

12 2. Sheriff's Office technicians are lower in rank than a deputy. They typically manage
13 the control booths from which they can watch prisoners and control the doors into the unit itself.

14 3. Housing Unit 33 at Santa Rita Jail holds approximately 300 inmates. The inmates are
15 housed in "pods" with each pod holding anywhere from 25 – 40 inmates. Generally, one or two
16 deputies are assigned to cover each housing unit.

17 4. Housing Unit 33 has two isolation cells, approximately 50 feet away from each other.
18 An isolation cell is used for a variety of reasons, including temporary placement during an escort,
19 strip searches, and segregation of a disorderly or mentally ill inmate from the rest of the inmate
20 population. The cells are 6 by 9 feet. They contain a bench (sometimes with a mattress over it),
21 toilet, and sink. The doors of the isolation cells have a small window, speaker holes, and a port
22 through which handcuffs may be applied while the door is closed.

23 5. The speaker holes aka door vent on the isolation cell door consists of a series of holes
24 in the door that allow deputies to speak with inmates without opening the isolation cell door.

25 6. Housing Unit 33 is a minimum security housing unit. Handcuffs are not required to
26 move inmates within a minimum security unit. It is the deputies' discretion whether to apply cuffs
27 while moving an inmate.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed on
2 November 10, 2013 at Oakland, California.

3 */s/ Matthew Ahlf*
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DEPUTY MATTHEW AHLF
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